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December 27, 2006

Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Dear Ms. Dortch:

Enclosed, please find a copy of the CPNI filing and an additional copy of the document for date stamp to be returned in the self addressed stamped envelope.

Thank you for your time.

Sincerely,

Yennifer A. Brislin Executive Secretary

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DEC 2 8 2006

FCC - MAILPOOM

December 21, 2006

Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

EB-06-TC-060 and EB Docket No. 06-36 CPNI Compliance Certification

Delhi Telephone Company

Dear Ms. Dortch:

This filing is intended to supplement the February 3, 2006, Delhi Telephone Company ("Company") Customer Proprietary Network Information ("CPNI") Compliance Certification. A copy is attached for your reference.

When responding to the Commission's Public Notice, DA 06-223 (Jan. 30, 2006), the Company undertook with counsel and the management staff a review of our CPNI practices. As a result of this review, we identified steps that would assist the Company's continuing compliance with CPNI as well as areas that might possibly require additional steps in order for the Company to be able to execute the certification required by 47 CFR 64.2009(e).

In May 2006 a consultant with the firm of John Staurulakis, Inc. reviewed the Company's policies and procedures with regard to compliance with CPNI rules. Additionally, at that time, employees that were responsible for day-to-day interaction with the public were interviewed to determine how they were actually applying the Company's policies in every day scenarios. After thorough review, it was determined that the Company was, in deed, completely compliant with all CPNI rules. To help insure continued compliance, a 4 hour class was held for all employees to reinforce the FCC's requirements and the measures the Company requires of its employees to protect CPNI.

As noted in the Company's February filing, the Delhi Telephone Company takes seriously its obligation to protect the confidential nature of its CPNI. The Company will continue to be diligent in maintaining policies, procedures, and employee practices in this important area.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

Douglas N. Edwards

Vice President

Attachment: CPNI Compliance Certification, February 3, 2006

DECLARATION

- I, Douglas N. Edwards, under penalty of perjury, hereby declare as follows:
 - 1. I am the Vice President of Delhi Telephone Company ("Delhi").
 - 2. I have personal knowledge of the representations provided in Delhi's supplemental filing, dated December 21, 2006, in File No. EB-06-TC-060, and verify that such representations are true and accurate.

Douglas N. Edwards

December 21, 2006

Date



February 3, 2006

Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

EB-06-TC-060 and EB Docket No. 06-36 CPNI Compliance Certification

Delhi Telephone Company

Dear Ms. Dortch:

This filing is intended to respond to the Commission's directive to file on or before February 6, 2006, Delhi Telephone Company ("Company") Customer Proprietary Network Information ("CPNI") Compliance Certification.

It is our policy to protect the confidential CPNI of our customers, other telecommunications carriers, and equipment manufacturers and we believe, in good faith, that our efforts have advanced this underlying objective. To that end, a written policy on the proper handling of CPNI is reviewed with employees semiannually. All new hires are immediately trained on the proper treatment of CPNI, prior to receiving access to any information system. All management employees are held responsible for the proper treatment of CPNI by their subordinates.

When responding to the Commission's recent Public Notice, DA 06-223 (Jan. 30, 2006), the Company undertook with counsel and the management staff a review of our CPNI practices. As a result of this review, we have identified steps that will assist the Company's continuing compliance with CPNI as well as areas that will require additional steps in order for the Company to be able to execute the certification required by 47 CFR 64.2009(e). Accordingly, erring on the side of caution, the Company submits the attached Certification. In this Certification, the Company, in good faith, attests that the Company is undertaking current actions to ensure

compliance. The Company also commits to submit a supplementary updated filing at a future date when its internal review is completed. Attached to this filing is a Company Policy and Operating Guidelines that the Company is utilizing in this process.

We note at this point that the Company takes seriously its obligation to protect the confidential nature of its CPNI, and we are unaware of our activities that are connected recently publicized "brokering" activities that would implicate, contemplate, or otherwise compromise the confidentiality of our customers' CPNI.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

/s/ Douglas N. Edwards

Douglas N. Edwards Assistant General Manager & Treasurer

CERTIFICATION

I, Steven M. Barker, Vice President and CEO of Delhi Telephone Company (the "Company") do hereby declare under penalties of perjury that I am an officer of the Company and that (1) the Company is undertaking current actions to ensure full compliance with applicable FCC Rules, and (2) intends to submit a supplementary updated filing at a future date when the internal review is completed. This information is true and accurate to the best of my knowledge, information, and belief.

/s/ Steven M. Barker	
Signature	
February 3, 2006	
Date	